

REED SMITH LLP

Formed in the State of Delaware

Philip W. Danziger, Esq.
C. Neil Gray, Esq. (admitted *pro hac vice*)
Julia A. Lopez, Esq.
506 Carnegie Center, Suite 300
Princeton, New Jersey 08540
Telephone: (609) 987-0050
Facsimile: (609) 951-0824

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

Richard Schirtzer, Esq.
(admitted *pro hac vice*)
865 S. Figueroa St., 10th Floor
Los Angeles, CA 90017
Tel. (213) 443-3000
Fax (213) 443-3100

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

Adam Abensohn, Esq.
(admitted *pro hac vice*)
Sandra Bresnick, Esq.
(*pro hac vice* forthcoming)
Christopher Kercher, Esq.
(*pro hac vice* forthcoming)
Jesse Bernstein, Esq.
(admitted *pro hac vice*)
Leigha Empson, Esq.
(admitted *pro hac vice*)
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

*Attorneys for Defendants Allergan plc,
Brenton L. Saunders, Paul M. Bisaro, Maria
Teresa Hilado, R. Todd Joyce, Sigurdur O.
Olafsson, David A. Buchen, James H. Bloem,
Christopher W. Bodine, Tamar D. Howson,
John A. King, Ph.D., Catherine M. Klema,
Jiri Michal, Jack Michelson, Patrick J.
O'Sullivan, Ronald R. Taylor, Andrew L.
Turner, Fred G. Weiss, Nesli Basgoz, M.D.,
and Christopher J. Coughlin*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE ALLERGAN GENERIC DRUG
PRICING SECURITIES LITIGATION

Civil Action No. 2:16-cv-09449 (KSH) (CLW)

**JOINT STIPULATION AND ORDER
REGARDING CLASS CERTIFICATION
BRIEFING SCHEDULE**

Plaintiffs Sjunde AP-Fonden and Union Asset Management Holding AG (“Plaintiffs”) and
Defendants Allergan PLC, Brenton L. Saunders, Paul M. Bisaro, Maria Teresa Hilado, R. Todd
Joyce, Sigurdur O. Olafsson, David A. Buchen, James H. Bloem, Christopher W. Bodine, Tamar

D. Howson, John A. King, Ph.D., Catherine M. Klema, Jiri Michal, Jack Michelson, Patrick J. O'Sullivan, Ronald R. Taylor, Andrew L. Turner, Fred G. Weiss, Nesli Basgoz, M.D., and Christopher J. Coughlin ("Defendants") respectfully submit this stipulation and proposed order requesting an amendment to the class certification briefing deadlines set in the Court's Order Regarding Amendment to Pretrial Scheduling Order in the above captioned action (Dkt. 142):

WHEREAS, the Court entered the initial Pretrial Scheduling Order in this Action on October 21, 2019 (Dkt. 134);

WHEREAS, the Court entered the Parties' Joint Stipulation and Order Regarding Amended to Pretrial Scheduling Order on March 11, 2020, which granted the Parties' request for a one-week extension of Plaintiffs' deadline to file their Motion for Class Certification and an eleven-week extension of all discovery deadlines (Dkt. 142);

WHEREAS, Plaintiffs filed a Motion for Class Certification on March 20, 2020 (Dkt. 143);

WHEREAS, Defendants requested an eight-week extension of the remaining briefing schedule on Plaintiffs' Motion for Class Certification to ensure Defendants have adequate time to complete discovery related to Plaintiffs' Motion for Class Certification in light of the anticipated delays arising out of the COVID-19 pandemic, and Plaintiffs consent to Defendants' request; and

WHEREAS, the Court conducted a telephonic status conference with the Parties on April 9, 2020, during which the requested modification to the remaining briefing schedule on Plaintiffs' Motion For Class Certification was discussed;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

1. The Parties respectfully request that the deadlines set forth in the Order Regarding Amendment to Pretrial Scheduling Order be modified as follows:

<u>Event</u>	<u>Current Date</u>	<u>Revised Date</u>
Opposition to Motion for Class Certification	June 5, 2020	July 31, 2020
Reply in Support of Motion for Class Certification	July 24, 2020	September 18, 2020

Respectfully Submitted,

**CARELLA, BYRNE, CECCHI, OLSTEIN,
BRODY & AGNELLO, P.C.**

Dated: April 10, 2020

s/ James E. Cecchi

James E. Cecchi
Donald A. Ecklund
5 Becker Farm Road
Roseland, NJ 07068
Telephone: (973) 994-1700
Facsimile: (973) 994-1744
jcecchi@carellabyrne.com
decklund@carellabyrne.com

*Liaison Counsel for Lead Plaintiffs
and the Class*

**KESSLER TOPAZ
MELTZER & CHECK, LLP**

Dated: April 10, 2020

s/ Matthew L. Mustokoff

Matthew L. Mustokoff
Margaret E. Mazzeo
Jonathan F. Neumann
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056
mmustokoff@ktmc.com
mmazzeo@ktmc.com
jneumann@ktmc.com

*Co-Lead Counsel for Lead Plaintiffs
and the Class*

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

Dated: April 10, 2020

s/ John C. Browne

John C. Browne
Lauren Ormsbee
Michael Mathai
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1448
johnb@blbglaw.com
lauren@blbglaw.com
michael.mathai@blbglaw.com

*Co-Lead Counsel for Lead Plaintiffs
and the Class*

REED SMITH LLP

Dated: April 10, 2020

s/ Philip W. Danziger

Philip W. Danziger, Esq.
C. Neil Gray, Esq. (admitted *pro hac vice*)
Julia A. Lopez, Esq.
506 Carnegie Center, Suite 300
Princeton, New Jersey 08540
Telephone: (609) 987-0050
Facsimile: (609) 951-0824
pdanziger@reedsmith.com

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

Richard Schirtzer, Esq.
(admitted *pro hac vice*)
865 S. Figueroa St., 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Adam Abensohn, Esq.
(admitted *pro hac vice*)
Sandra Bresnick, Esq.
(*pro hac vice* forthcoming)
Christopher Kercher, Esq.
(*pro hac vice* forthcoming)

Jesse Bernstein, Esq.
(admitted *pro hac vice*)
Leigha Empson, Esq.
(admitted *pro hac vice*)
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Attorneys for Defendants

PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.

Dated: _____ April 13, 2020

//s Cathy L. Waldor

HON. CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE